

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**RACHAEL ANNE ELROD, ANDREW  
KAUFMAN, and SARAH MARTIN, on  
behalf of themselves and all others  
similarly situated,**

**Plaintiffs,**

**v.**

**NO TAX 4 NASH, JIM ROBERTS,  
MICHELLE FOREMAN, KIMBERLY  
EDWARDS, and JOHN DOES 1-10,**

**Defendants.**

**No. 3:20-cv-00617**

**District Judge Eli J. Richardson  
Magistrate Judge Barbara D. Holmes**

**CLASS ACTION**

**JURY TRIAL DEMANDED**

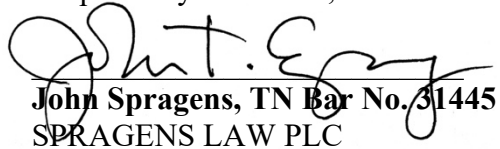
**PLAINTIFFS' NOTICE OF PENDING MOTION TO CONSOLIDATE**

Plaintiffs Rachael Anne Elrod, Andrew Kaufman, and Sarah Martin, individually and on behalf of all others similarly situated, file this Notice to inform the Court of a pending motion in a related action. Plaintiff in *Brasfield v. NoTax4Nash, et al.*, No. 3:20-cv-00618 (M.D. Tenn.), an action involving substantively identical factual and legal allegations as those in this case, filed an Unopposed Motion to Transfer and Consolidate requesting that *Brasfield* be transferred to this Court and consolidated with this, the first-filed action. *See* Ex. 1 (Motion and Memorandum of Law). As of today's date, no responses have been filed, and the motion remains pending.

Plaintiffs Elrod, Kaufman, and Martin do not oppose the *Brasfield* plaintiff's motion but wanted to notify the Court about the possibility of consolidation before the September 1, 2020 initial case management conference in this action.

Date: August 20, 2020

Respectfully submitted,

  
**John Spragens, TN Bar No. 31445**

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*Attorneys for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Notice has been served  
via the Court's CM/ECF system upon:

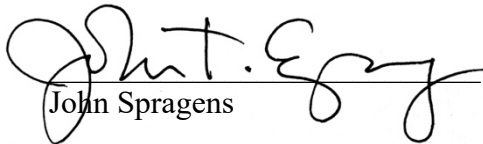
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*Attorney for Defendant Michelle Foreman*

Notice has additionally been e-mailed to counsel for Defendant Kimberly Edwards, who has not  
yet appeared in this action.

  
John Spragens